

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

U.S. DISTRICT COURT
N.D. OF ALABAMA

LYDIA HOVANSKI,
Plaintiff,

vs.

CIVIL ACTION NO.:
CV-03-S-0838-S

AMERICAN INCOME LIFE INSURANCE
COMPANY; REA AGENCY CORPORATION,
ALLAN JENNINGS, in his official capacity as
State General Agent for AMERICAN INCOME
LIFE INSURANCE COMPANY and
individually, and OFFICE AND
EMPLOYEES INTERNATIONAL UNION,
LOCAL 277

Defendants

PLAINTIFF'S EXHIBIT LIST

COMES NOW the Plaintiff Lydia Hovanski and submits the following exhibits pursuant to the Court's Scheduling Order:

A Documents Plaintiff Intends to Use at Trial

1. Public relations contract of Lydia Hovanski dated May 22, 2001. (bates number 0005)
2. American Insurance Life Insurance Company, (hereinafter ("AIL")), employment application of Lydia Hovanski. (bates number 0021-0023)
3. AIL application for union membership of Lydia Hovanski. (bates number 0059)
4. AIL union dues check-off authorization form of Lydia Hovanski. (bates number 0020)
5. Termination letter of Lydia Hovanski dated 11/1/02. (bates number 0122)
6. Sexual harassment policy of OPEIU 277

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7. Facsimile from Emily Jennings to Debbie Gamble dated 11/06/02 re: EEOC charge of Hovanski.
8. Letter from Allen Jennings to the EEOC dated 11/14/02. (bates number 0009)
9. Termination letter of Lydia Hovanski. (bates number 0049)
10. AIL employment eligibility verification for Lydia Hovanski. (bates number 0024)
11. AIL consumer notification and authorization form for Lydia Hovanski. (bates number 0025).
12. E-mails between Denise Bowyer to Christi Garland dated June 29, 2001 and June 30, 2001 regarding Lydia Hovanski. (Bates number 0026)
13. E-mails between Allen Jennings and Susan Snowden regarding reassigning of groups from Hovanski to Schouten.
14. Phone memo form dated 6/12/02. (bates number 0995)
15. E-mail from Lee Anne Jackson to Allen Jennings dated March 10, 2003. (bates number 0293)
16. E-mail from Allen Jennings to Lee Anne Jackson dated March 10 2003. (bates number 0292)
17. E-mail from Allen Jennings to Lee Anne Jackson dated 10/15/02. (bates number 0300)
18. E-mails regarding Marcellus Adams. (bates number 0305-0307)
19. Facsimile from Denise Bowyer and Allen Jennings to Susan Snowden dated 2/04/02. (bates number 0312)
20. Facsimile from Denise Bowyer to Allen Jennings and Bill Jennings dated 2/4/02. (bates number 0313/0314)
21. E-mail from Diana Crosby to Sherry Trlica dated 12/31/02. (bates number 0351)
22. E-mail from Diana Crosby to Allen Jennings dated 1/24/02. (bates number 0357)
23. E-mails between Pat McFarland and Rhonda Cunningham regarding manager overrides for Emily Jennings. (bates number 0375)

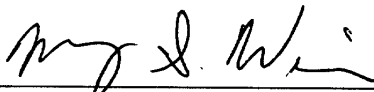
24. AIL general agent contract of Allen Jennings. (bates number 0617-0619)
25. AIL state general agent contract of Allen Jennings. (bates number 0655-0657)
26. Authorization for stock purchase plan. (bates number 00032)
27. E-mails between Linda Harper, Pat McFarland, and Lee Anne Jackson. (bates number 0286-0288)
28. E-mails between Denise Bowyer and Susan Snowden dated 2/21/02. (bates number 0308)
29. E-mails between Denise Bowyer and Susan Snowden. (bates number 0309)
30. Series of e-mails regarding manager overrides for Emily Jennings (bates number 0310)
31. AIL promotion request form. (bates number 0841)
32. Public relations contract of Randy Schouten. (bates number 0877)
33. Letter from Julie Randolph to Randy Schouten dated 11/15/02. (bates number 0893)
34. AIL pubic relations policies and standards. (bates number 1362-1442)
35. Spotlight Magazine dated November of 2002.
36. Letter from Roger Smith to Allen Jennings dated 3/25/03. (bates number 0663)
37. Note from Lee Anne Jackson to Lydia Hovanski reflecting her debit balance on 10/11/02.
38. E-mails between Lee Anne Jackson and Allen Jennings dated 5/8/03. (bates number 0290)
39. Letter dated 4/7/02 from Lydia Hovanski to Progressive Federal Credit Union.
40. Business card of Lydia Hovanski.
41. Letter dated 6/10/02 from Roger Smith to Lydia Hovanski.
42. AIL memogram to Lydia Hovanski.
43. Facsimile cover sheet dated/ 8/28/02 to Allen Jennings, Marjorie Wade and Lydia

Hovanski from Pat McFarland.

44. Facsimile cover sheet to Allen Jennings, Marjorie Wade and Lydia Hovanski regarding pre-approach letter and corresponding coverage.
45. AIL form reflecting Lydia Hovanski as Regional Director of Public Relations.
46. Life Insurance Policy issued to Lydia Hovanski from AIL.
47. EEOC charge of Lydia Hovanski.
48. Supplemental EEOC charge of Lydia Hovanski.
49. Letter from Roger Smith to Lydia Hovanski dated 6/10/02. (bates number 0040)
50. AIL ACH instructions for agency payments to Lydia Hovanski. (bates number 0047)
51. AIL form documenting Lydia Hovanski's debit balance. (bates number 0050)
52. E-mail from Debbie Gamble to State General Agents dated 7/8/02. (bates number 0051)
53. Certain PR Lead Credit Report for Lydia Hovanski.
54. E-mails between Denise Bowyer and Susan Snowden dated 2/2/02. (bates number 0309)
55. Letter written by Rhonda York dated 4/23/03. (bates number 0660)
56. E-mail from Debbie Gamble to Emily Jennings dated 4/22/03. (bates number 0662)
57. Letter from Roger Smith to Allen Jennings dated 3/25/03. (bates number 0663)
58. E-mails between Pat McFarland and Lydia Hovanski dated 10/8/02. (bates number 0370)
59. Letter from Melissa Garrett dated 12/26/02 regarding deposit of check to Lydia Hovanski into account of Marcellus Adams.
60. AIL Blue Paper of the month.
61. Facsimile to Debbie Gamble from Emily Jennings dated 11/15/02. (bates number 0027)
62. Facsimile to Debbie Gamble from Emily Jennings dated 11/06/02. (bates number

- 0028)
- B. Documents Plaintiff May Use At Trial
63. E-mail from Debbie Gamble to SGA dated 7/17/03. (bates number 0041)
 64. E-mails regarding PJACL dated 10/22/03. (bates number 0062-0063)
 65. Letter from Debbie Gamble to Marcellus Adams dated 10/07/03. (bates number 1288)
 66. Spotlight Magazine August 2002.
 67. Facsimile to Debbie Gamble from Emily Jennings dated 1/22/03. (bates number 0013)
 68. Certain AG and TG forms produced by Hovanski in her initial disclosures. (bates numbers 0076-0175)
 69. Certain PR Lead Credit Reports and Group Reports. (bates number 1586-1999)
 70. Letter from Roger Smith to Marjorie Wade dated 12/10/01. (bates number 0921)
 71. Plaintiff's tax records and other pay records used for calculating backpay
 72. All documents and tape recordings used for rebuttal
 73. All admissible documents listed on the defendants' exhibit list.
 74. All charts and graphs summarizing evidence.
 75. Any necessary rebuttal documents or things.
 76. All backpay charts and calculations.

Respectfully submitted,



Jon C. Goldfarb
Maury S. Weiner
Counsel for Plaintiff

OF COUNSEL:

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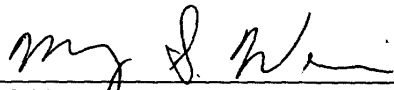
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was served via Facsimile and U.S. mail, postage prepaid and properly addressed to:

Sally Broatch Waudby, Esq.
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Stephen E. Whitehead, Esq.,
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on this the 2nd day of April, 2004.



OF COUNSEL